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10 UNITED STATES DISTRICT

11 COURT NORTHERN DISTRICT OF CALIFORNIA

12 OAKLAND DIVISION

13 ZOYA KOVALENKO,) Case No.: 4:22-cv-05990-(HSG)
 14 Plaintiff,)
 15 vs.)
 16 KIRKLAND & ELLIS LLP, MICHAEL DE)
 VRIES, MICHAEL W. DEVRIES, P.C., ADAM)
 17 ALPER, ADAM R. ALPER, P.C., AKSHAY)
 DEORAS, AKSHAY S. DEORAS, P.C., AND)
 MARK FAHEY,)
 18) Assigned to the Honorable Haywood S. Gilliam,
 19 Defendants.) Jr., Oakland Division, United States District
) Court for the Northern District of California
 20)
 21)
 22)
 23)
 24)
 25)
 26)
 27)
 28)

NOTICE OF MOTION AND ADMINISTRATIVE MOTION FOR TELEPHONIC OR
VIDEO CONFERENCE

TO ALL PARTIES AND THEIR COUNSEL OF RECORD: PLEASE TAKE NOTICE
 THAT Non-Party Filippatos PLLC respectfully requests that all parties be permitted to participate in
 the hearing on Plaintiff Zoya Kovalenko's pending Motion to Notice Termination of Filippatos PLLC
 MOT. FOR A TELEPHONIC CONFERENCE

1 For Cause (Dkt. No. 171) and Filippatos PLLC's and local counsel Hennig Kramer LLP's pending
 2 Cross Motion To Withdraw as Counsel and To Compel Arbitration (Dkt. No. 177), presently noticed
 3 for Thursday, March 20, 2025, at 2:00pm before the Honorable Haywood S. Gilliam, Jr., remotely
 4 via video conference or the phone.

5 There is good cause to hold this conference remotely. First, Filippatos PLLC is based in New
 6 York. Rahman Decl. at ¶ 2. It would be a hardship for the undersigned to have to travel to Oakland,
 7 California merely to attend this hearing in person given the length of time and expense it would take
 8 to travel cross country to and from California, as well as the disruption it will cause to certain family
 9 and childcare obligations of the undersigned. Rahman Decl. at ¶ 3. Moreover, the undersigned is a
 10 practicing Muslim, and it will be a hardship to travel to and from Oakland, California in the present
 11 month of Ramadan, in which the undersigned will be fasting during daytime hours. Rahman Decl. at
 12 ¶ 4. Further, all other hearings that have taken place since Filippatos PLLC has appeared in this case
 13 have been conducted remotely without issue, including the hearing with respect to Plaintiff's Motion
 14 to Quash Defendants' Subpoenas and For Protective Order (Dkt. No. 113), which was held remotely
 15 on February 15, 2024 (*see* Dkt. Nos. 125; 146); a discovery hearing which took place remotely on
 16 October 2, 2024 (*see* Dkt. No. 143); and a Case management Conference held remotely on October
 17 8, 2024. *See* Dkt. No. 153. Rahman Decl. at ¶ 5.

18 We have conferred with counsel for Defendants who have no objection to this request.
 19 Rahman Decl. at ¶ 6. We have also conferred with Plaintiff Zoya Kovalenko who has indicated that
 20 she does not consent to this request because she does not believe there is good cause to request a
 21 remote hearing. Rahman Decl. at ¶ 7. We respectfully submit that there is good cause to hold this
 22 hearing remotely given that Filippatos PLLC is based in New York and it would be a hardship to
 23 travel cross country merely to attend this hearing (which is based on a motion filed by Plaintiff which
 24 Filippatos PLLC maintains, respectfully, was improperly filed with and should not be heard by this
 25 Court), all other hearings that have taken place since Filippatos PLLC has appeared in this case have
 26 been conducted remotely, and, while she does not join in this request, we understand that Plaintiff

1 Kovalenko presently resides in Maryland and has stated in a declaration submitted to this Court that
 2 paying her outstanding legal costs incurred on her behalf by Filippatos PLLC would “impose a
 3 financial hardship on [her] given that [she has] been unemployed since being terminated in 2021”
 4 (see Dkt. No. 181-1, at ¶ 7), which would suggest that traveling cross country to attend this hearing
 5 in person would also pose a “financial hardship.” Rahman Decl. at ¶ 8-9.

6 Accordingly, we respectfully request that the Court convert the March 20, 2025, in-person
 7 hearing into a remote hearing. A proposed order is simultaneously being filed for the Court’s
 8 convenience.

9 Date: March 3, 2025
 10 White Plains, New York

11 Respectfully submitted,

12 By: /s/ Tanvir H. Rahman
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